

EXHIBIT A

Charles Monroe
1121 Rock Street
Scranton, PA 18504

MARY E. RINALDI
LACKAWANNA COUNTY

2015 MAR 19 PM 1 08

CLERK OF JUDICIAL
RECORDS CIVIL DIVISION

v.

Firstsource Advantage, LLC
205 Bryant Woods South
Amherst, NY 14228

Court of Common Pleas of Lackawanna
County - Civil Action

Case No. 15-CV-2149

Defendant

Jury Trial Demanded

NOTICE

YOU HAVE BEEN SUED IN COURT. If you wish to defend against the claim set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by an attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you. YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER. IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED RATE OR NO FEE.

Northeastern Pennsylvania Legal Services
33 North Main Street, Suite 200
Pittston, PA 18640
Telephone (570) 299-4100

MARY F. RINALDI
LACKAWANNA COUNTY

Charles Monroe,
v.
Firstsource Advantage, LLC,

Plaintiff
Defendant

2015 APR 19 PM 1:19
CLERK OF JUDICIAL
RECORDS CIVIL DIVISION

Court of Common Pleas of Lackawanna
County - Civil Action
Case No. _____-CV-_____
Jury Trial Demanded

COMPLAINT

I. Introduction

1. This is an action for damages brought by an individual consumer for violations of the Fair Debt Collection Practices Act, 15 U.S.C. § 1692, *et seq.* ("the Act") which prohibits debt collectors from engaging in abusive, unfair, and deceptive practices.

II. Jurisdiction

2. Jurisdiction of this Court is proper pursuant to 15 U.S.C. § 1692k(d), which permits an action under the Act to be brought in any court of competent jurisdiction.

3. Venue in this district is proper in that Defendant transacts business here and the conduct complained of is alleged to have occurred here.

III. Parties

4. Plaintiff, Charles Monroe, is a natural person residing at 1121 Rock Street, Scranton, PA 18504.

5. Defendant, Firstsource Advantage, LLC, ("FSA") is a limited liability corporation engaged in the business of collecting debts in this state with a place of business located at 205 Bryant Woods South, Amherst, NY 14228 and is a "debt collector" as defined by the Act, 15 U.S.C. § 1692a(6).

IV. Statement of Claim

6. Within the past year FSA was attempting to collect from Plaintiff an alleged account that was identified by a number ending in 2508 ("the Account").
7. The Account is a "debt" as that term is defined by the Act, 15 U.S.C. § 1692a(5).
8. FSA regularly uses the mails to attempt to collect debts asserted to be due another.
9. On or about August, 8, 2014, FSA caused to be mailed a letter addressed to Plaintiff.
10. A true and correct copy of the letter is attached as Exhibit A. (Redacted to ensure financial privacy.)
11. The letter was an attempt to collect the Account.
12. The return mailing address for the letter appeared as follows:



CZFRST02
PO Box 1022
Wixom MI 48393-1022

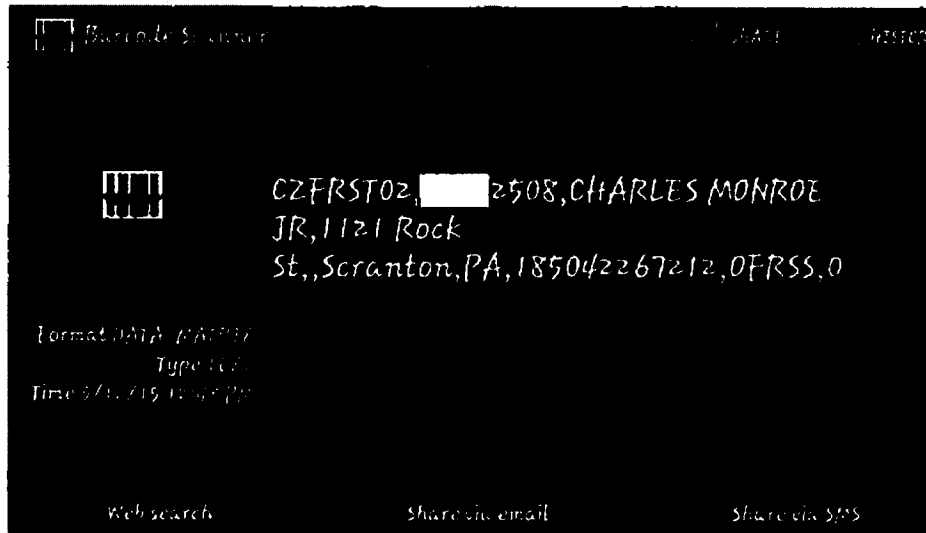
CHANGE SERVICE REQUESTED

(Redacted for financial privacy).

13. The redacted area in the previous paragraph covers a specialized type of bar code known as a Quick Response Code or QR code.
14. QR codes can be easily deciphered by consumers using widely-available free applications for smart phones. Many consumers have these applications already installed on their smart phones to enable them to access QR codes. A QR code is a specific type of bar code that is used in marketing literature by many companies to

enable consumers to direct their smart phone to a website merely by scanning the code. Thus, many consumers have installed QR code readers on their phones to take advantage of the convenience offered by scanning QR codes.

15. The QR code contains the following information:



(Redacted for financial privacy.)

16. This account number that appeared in the QR code next to the return address, was a number that was associated solely with the Account, and was therefore personal identifying information related to Plaintiff.


17. By disclosing Plaintiff's sensitive financial information on an envelope sent through the U.S. mail, Defendant increased the risk that Plaintiff would be a victim of identity theft.

18. Defendant also violated 15 U.S.C. § 1692f(8) of the Act, which generally prohibits the use of "any language or symbol, other than the debt collector's address, on any envelope when communicating with a consumer by use of the mails"

19. Defendant violated the Act.

WHEREFORE, Plaintiff demands judgment against Defendant for damages, costs, attorney's fees, and such other and further relief as the Court deems just and proper.

Respectfully Submitted,



Carlo Sabatini
Bar Number PA 83831
Attorney for Plaintiff
Sabatini Law Firm, LLC
216 N. Blakely St.
Dunmore, PA 18512
Phone (570) 341-9000

Verification by Plaintiff Charles Monroe

I affirm that the averments of fact contained in this pleading are true upon my personal knowledge or information and belief.



Charles Monroe

Exhibit A

(Letter dated 08-08-14)

Do not send correspondence to this address.

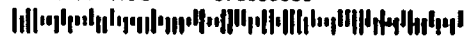


CZFRST02
PO Box 1022
Wixom MI 48393-1022
CHANGE SERVICE REQUESTED

0014081200

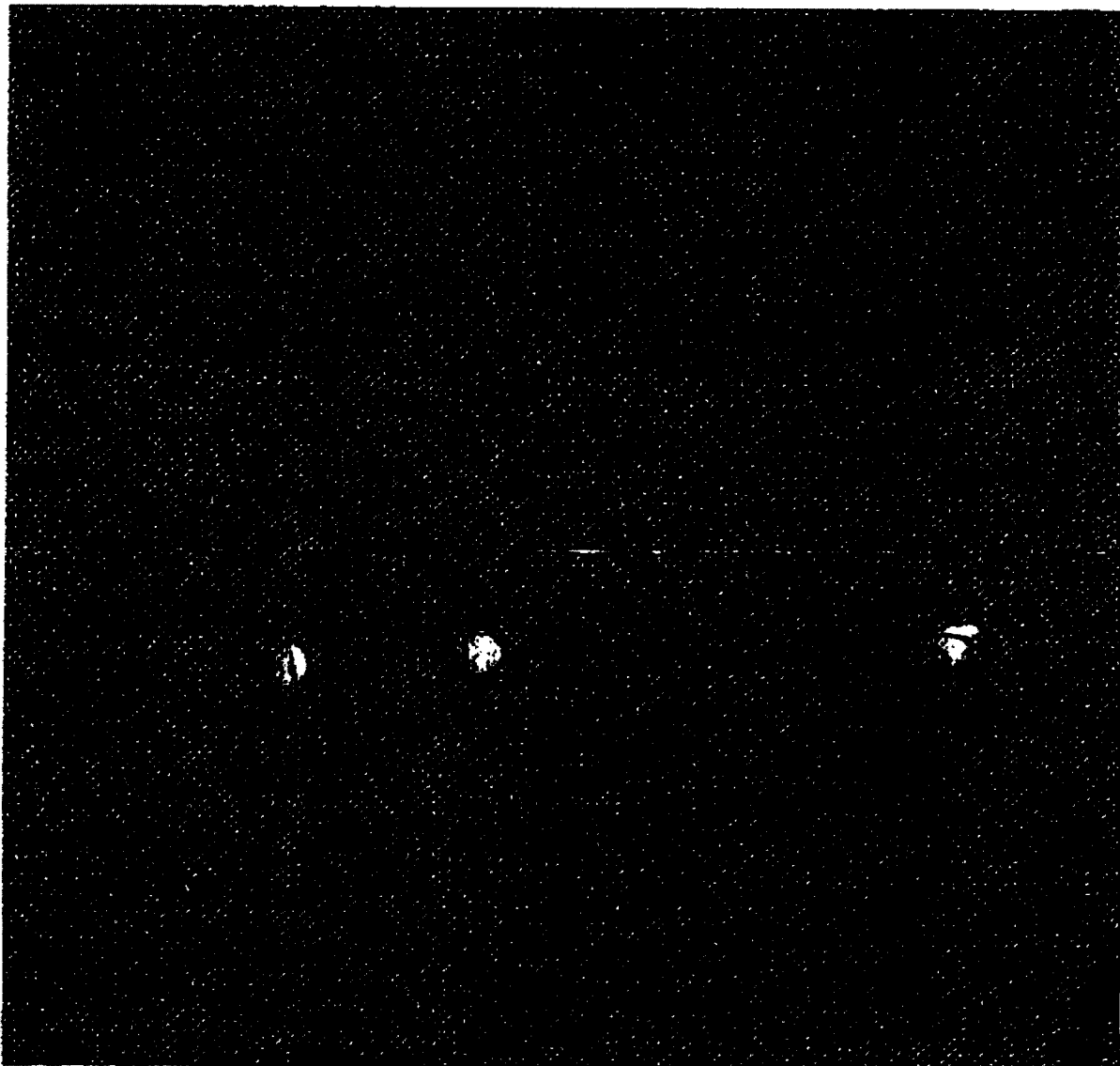
PRESORTED
FIRST-CLASS
MAIL
U.S. POSTAGE
PAID
CPCH

TRGT2/OFRSS 373089636



CHARLES MONROE JR
1121 ROCK ST
SCRANTON PA 18504-2267

69 CVJ-NP1 18504



Statement Date: 08-08-14
 Creditor: TD BANK USA, N.A./TARGET CREDIT CARD
 Our Reference #: 2508
 Creditor Account #: XXXXXXXXX9490
 Account Balance: \$484.58



Firstsource Advantage, LLC
 205 Bryant Woods South, Amherst, NY 14228 • 1-888-446-8457
 Firstsource Advantage, LLC is not affiliated with 1st Source Bank

Dear Charles Monroe Jr.

We would like to offer you the following flexible options to assist you in an equitable resolution to your account.

<p>The opportunity to pay your account in full over 5 months with a \$96.84 down payment due 8/29/14 and monthly installments of \$96.91 due on the 29th of each month until 12/29/2014</p>	<p>An offer to settle the account in full with a one time payment of \$339.21 (a savings of \$146.37) due on 8/29/14</p>	<p>An offer to settle the account in full over 3 months with equal payments of \$137.30 (a savings of \$72.68) with the first payment due on or before 8/29/14 and the last payment due on or before 10/29/2014</p>
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You should understand and consider the terms of any settlement before agreeing to it.

We reserve the right to treat any missed, late or returned payment as a cancellation of any payment arrangement. We are not obligated to renew this payment offer.

Due to our need to determine your intent with regard to this matter, please respond to this offer by contacting us at 1-888-446-8457 before 8/29/14. Our staff of professional debt specialists is trained to assist you with the program that suits your needs.

This is a communication from a debt collector. This is an attempt to collect a debt and any information obtained will be used for that purpose.

Sincerely,

Firstsource Advantage, LLC
 A Professional Debt Recovery Agency

400CZFRT020FRSS

<p> - Contact Us: 1-888-446-8457 TTY / TDD Users: 1-800-662-1220</p>	<p> - Office Hours (Eastern Time) Mon and Tues 8am-9pm Wed - Fri 8am-8pm Sat 8am-12pm</p>	<p> - Send correspondence to: Firstsource Advantage, LLC 205 Bryant Woods South Amherst, NY 14228</p>	<p> - Pay Online For account information and payment options, you may access our website at www.fsapay.com</p>
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IF PAYING BY DEBIT CARD, FILL OUT BELOW.		
<input type="checkbox"/> <input type="checkbox"/>		
CARD NUMBER		EXPIRATION DATE
SIGNATURE		PAYMENT DATE
ACCOUNT #	BALANCE DUE	AMOUNT PAID
2508	\$484.58	\$

Make Payment To:
 FIRSTSOURCE ADVANTAGE, LLC
 PO BOX 628
 BUFFALO NY 14240-0628



IMPORTANT: To receive proper credit, be sure to enclose this portion with your payment